

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**CASE NO. 03-CR-10356-MLW**

**UNITED STATES**

**VS.**

**FREDERICK A. SIMONE,  
a/k/a FREDDY, a/k/a  
THE NEIGHBOR,**

**VINCENT C. GIOCCHINI,  
a/k/a DEE DEE; and**

**FRANCIS WHITE, a/k/a  
THE WHITE-HAIRED GUY**

**DEFENDANTS, VINCENT C. GIOCCHINI AND FREDERICK A. SIMONE'S  
ASSENTED TO MOTION RE: SCHEDULING HEARINGS**

Now come the defendants in the above numbered indictment and move this Honorable Court for an order scheduling hearings on the instant case after defendant, Frederick Simone's state trial which is presently scheduled to commence on March 15, 2005 in Middlesex Superior Court. At present, counsel for defendant, Simone, will be out of the country until January 24<sup>th</sup> and upon his return will be starting the trial of Commonwealth vs. Arnold Casavant in Brockton Superior Court before Hon. Linda Giles. There are a number of other matters that will prevent counsel's availability. The Simone matter is scheduled for March 15<sup>th</sup> with the likelihood of resolving that case as it has been marked no further continuances, first case out before Judge Grabau.

In the interest of judicial economy and the interest of justice it appears that this may be the most expedient resolution of this matter at this time. Therefore request is

made that this matter be continued for status conference to date after Simone's trial in the state court.

Frederick Simone  
By his attorney

/s/Kevin J. Reddington"

Vincent C. Giocchini,  
By his attorney

/s/ Robert George, Esq.

Assented to

/s/ Ernest S. Dinisco  
Assistant U.S. Attorney